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Attorneys & Counselors at Law

August 29, 2023

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Zach Cook Zach Cook, LLC 1202 Sudderth #425 Ruidoso, NM 88345 zach@zachcook.com

Re: Springer v. Seventh Judicial District et al.

Case No. 1:23-CV-00499

Dear Mr. Dunn and Mr. Cook:

Please be advised that this firm has been retained to represent the Seventh Judicial District, Judge Mercedes Murphy, Judge Shannon Murdock-Poff, Jason Jones, and Susan Rossignol in the above-referenced matter.

This letter is a formal request that your client, James Springer, preserve and not alter the following evidence:

- 1. Any and all raw, unedited, and edited photographs, video recordings, recorded audio or computer media, measurements, real evidence, documents, materials and all other evidence and things relating to Mr. Springer's YouTube channel(s) and social media accounts which are presently in his possession or the possession of his aliases, businesses, employees, or agents;
- 2. Any and all posts, comments, and messages by Mr. Springer's social media accounts/platforms, including but not limited to his YouTube channel(s), Instagram,

Garcia Law Group, LLC August 29, 2023 Page 2

Facebook, TikTok, X (formerly Twitter), WhatsApp, Snapchat, Reddit, blogs, and video blogs;

- 3. Any and all posts, comments, and messages on Mr. Springer's social media accounts/platforms, including but not limited to his YouTube channel(s), Instagram, Facebook, TikTok, X (formerly Twitter), WhatsApp, Snapchat, Reddit, blogs, and video blogs;
- 4. Any and all notes, drafts, scripts, and communications pertaining to Mr. Springer's social media accounts/platforms, including but not limited to his YouTube channel(s), Instagram, Facebook, TikTok, X (formerly Twitter), WhatsApp, Snapchat, Reddit, blogs, and video blogs;
- 5. Any and all articles and interviews pertaining to Mr. Springer's social media accounts/platforms, including but not limited to his YouTube channel(s), Instagram, Facebook, TikTok, X (formerly Twitter), WhatsApp, Snapchat, Reddit, blogs, and video blogs;
- 6. Any and all correspondence, such as, but not limited to, emails, messages, texts, and letters from and to followers of Mr. Springer's social media accounts/platforms, including but not limited to his YouTube channel(s), Instagram, Facebook, TikTok, X (formerly Twitter), WhatsApp, Snapchat, Reddit, blogs, and video blogs;
- 7. Any and all review pertaining to Mr. Springer and/or his social media accounts/platforms, including but not limited to his YouTube channel(s), Instagram, Facebook, TikTok, X (formerly Twitter), WhatsApp, Snapchat, Reddit, blogs, and video blogs;
- 8. Any and all complaints pertaining to Mr. Springer and/or his social media accounts/platforms, including but not limited to his YouTube channel(s), Instagram, Facebook, TikTok, X (formerly Twitter), WhatsApp, Snapchat, Reddit, blogs, and video blogs;
- 9. Any and all investigations pertaining to Mr. Springer and/or his social media accounts/platforms, including but not limited to his YouTube channel(s), Instagram, Facebook, TikTok, X (formerly Twitter), WhatsApp, Snapchat, Reddit, blogs, and video blogs;
- 10. Documentation of any and all incidents that occurred as a result of the actions of Mr. Springer and/or his social media accounts/platforms, including but not limited to his YouTube channel(s), Instagram, Facebook, TikTok, X (formerly Twitter), WhatsApp, Snapchat, Reddit, blogs, and video blogs;
- 11. Any and all statements, notes, audio or video recordings and other material or things obtained from any person having information pertaining to Mr. Springer and/or his social media accounts/platforms, including but not limited to his YouTube channel(s), Instagram,

Case 1:23-cv-00499-MIS-JMR Document 29-1 Filed 09/05/23 Page 3 of 3

Garcia Law Group, LLC August 29, 2023 Page 3

Facebook, TikTok, X (formerly Twitter), WhatsApp, Snapchat, Reddit, blogs, and video blogs; and

12. Any and all financial information pertaining to Mr. Springer and/or his social media accounts/platforms, including but not limited to his YouTube channel(s), Instagram, Facebook, TikTok, X (formerly Twitter), WhatsApp, Snapchat, Reddit, blogs, and video blogs.

Please retain all evidence. Please also forward a copy of this letter to all persons and entities with custodial responsibility for the items referred to in this letter, specifically including third parties and vendors.

Sincerely,

Jade Delfin

JD/il